

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	Case No. 1:22-cv-06918
behalf of all others similarly situated,)	
)	
Plaintiff,)	Hon. Franklin U. Valderrama
)	
v.)	Magistrate Judge Gabriel A. Fuentes
)	
BELKIN INTERNATIONAL, INC.,)	
)	
Defendant.)	

DECLARATION OF BRADLEY F. SILVERMAN

I, BRADLEY F. SILVERMAN, declare:

1. I am counsel to the law firm of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, attorneys for plaintiff Dennis Gromov (“Plaintiff”). I have been admitted *pro hac vice* to represent Plaintiff in the above-captioned action. See ECF No. 18. I make this declaration in support of Plaintiff’s motion to compel disclosure.

2. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.

3. On February 8, 2024, I and my co-counsel Jason Ibey telephonically met and conferred with Defendant's counsel, Katelyn VanDoorne, concerning a representative sampling of Defendant's power bank models regarding which Defendant would produce discovery. Despite this good faith attempt to resolve differences, the parties were unable to reach an accord. The attempts by Plaintiff's counsel to engage in such consultation were unsuccessful due to no fault of Plaintiff's counsel.

4. An email sent by me to Defendant's counsel on February 12, 2024 (which is annexed hereto as Exhibit B) confirmed the failure to reach an accord. By that date, it is my understanding that the parties were at an impasse concerning the issue of a representative sampling of Belkin's power bank models for purposes of discovery.

5. Previously, counsel for the parties exchanged numerous written communications relating to the discovery dispute concerning a representative sampling of Defendant's power banks models, including, for example, on January 9, 2024, January 24, 2024, January 26, 2024, January 30, 2024, and February 9, 2024.

6. Annexed hereto as Exhibit A is a true and correct copy of a spreadsheet sent to Plaintiff's counsel by Defendant's counsel listing Defendant's power bank models and, through color coding, setting out the positions of the parties regarding a representative sampling of Defendant's power banks models.

7. Annexed hereto as Exhibit B is a true and correct copy of an email chain between the parties regarding the parties' discovery disputes.

8. Annexed hereto as Exhibit C is a true and correct copy of a printout of the following page from Defendant's website: <https://www.belkin.com/products/chargers/portable-chargers-power-banks/?prefn1=excludeFromSearch&prefv1=false&start=0&sz=12>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2024 in Irvington, New York.

/s/ Bradley F. Silverman
BRADLEY F. SILVERMAN